

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

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UNITED STATES SECURITIES AND EXCHANGE COMMISSION,	:	
	:	
Plaintiff,	:	CASE NO. 07 C 4684
	:	
v.	:	Honorable Charles P. Kocoras
	:	
SENTINEL MANAGEMENT GROUP, INC ERIC A. BLOOM, AND CHARLES K. MOSLEY,	:	Magistrate Judge Sheila M. Finnegan
	:	
Defendants.	:	
	:	

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**PLAINTIFF'S MOTION FOR ENTRY OF FINAL JUDGMENTS BY CONSENT  
AGAINST DEFENDANTS ERIC A. BLOOM AND CHARLES K. MOSLEY AND  
MOTION TO DISMISS MONETARY CLAIMS AGAINST THESE DEFENDANTS**

Plaintiff, U.S. Securities and Exchange Commission (the “SEC”), respectfully moves this Court for entry of Final Judgments by consent against Defendants Eric A. Bloom (“Bloom”) and Charles K. Mosley (“Mosley”). The SEC has filed a civil complaint against Bloom and Mosley. (See Docket Entry No. 64) Bloom and Mosley each have agreed to resolve this matter by the entry of a final judgment. (See Exhibit A, Consent of Eric A. Bloom; Exhibit B, Consent of Charles K. Mosley) Accordingly, the SEC now submits proposed Final Judgments against each of Bloom and Mosley. (See Exhibit C, proposed Final Judgment as to Bloom; Exhibit D, proposed Final Judgment as to Mosley). The SEC has submitted these proposed Final Judgments to the Court’s e-mail address at [Proposed\\_Order\\_Kocoras@ilnd.uscourts.gov](mailto:Proposed_Order_Kocoras@ilnd.uscourts.gov).

Bloom’s Consent contains a provision that if the appellate court vacates Bloom’s criminal conviction in *United States v. Eric A. Bloom*, Case No. 1:12-cr-409, then upon motion by Bloom,

his Consent will be considered withdrawn, the Final Judgment as to him will be vacated, and this action as to him will be restored to an active docket.

The proposed Final Judgments do not provide for disgorgement, prejudgment interest, or civil penalties against Bloom and Mosley. Accordingly, the SEC moves to dismiss these monetary claims based on the criminal convictions against Bloom and Mosley, and the criminal sanctions imposed on them; provided, however, that if the appellate court vacates Bloom's criminal conviction, and Bloom moves to vacate the Final Judgment against him as set forth in the preceding paragraph above, then the SEC's monetary claims against him will be restored to an active docket, along with the rest of the case against him.

On December 4, 2015, this Court continued a status hearing to January 28, 2016 to allow the parties to finalize settlement papers. (*See* Docket Entry No. 272) Because the parties now have finalized their settlements, and the case is fully resolved, the SEC respectfully requests that this January 28 status hearing be stricken.

WHEREFORE, the SEC respectfully requests that this Court: (i) grant this motion; (ii) enter Final Judgments by consent against Defendants Eric A. Bloom and Charles K. Mosley, (iii) dismiss the SEC's claims for monetary relief against Bloom and Mosley, as set forth above; (iv) strike the January 28, 2016 status hearing; and (v) award such other and further relief as this Court deems just.

Dated: January 21, 2016

Respectfully submitted,

*/s/Eric M. Phillips*

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*Attorneys for the Plaintiff, the United States Securities and  
Exchange Commission*

**CERTIFICATE OF SERVICE**

I, Eric M. Phillips, an attorney, being duly sworn, state on oath that on January 21, 2016, I caused Plaintiff's Motion for Entry of Final Judgments by Consent Against Defendant Eric A. Bloom and Charles K. Mosley and Motion to Dismiss the SEC's Monetary Claims Against These Defendants to be served upon the following counsel by the Court's CM/ECF system:

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Attorneys for Defendant Charles K. Mosley

/s/ Eric M. Phillips  
Eric M. Phillips